

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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UNITED STATES OF AMERICA,

Plaintiff and  
Counter Defendant,

v.

TOWN OF LAC DU FLAMBEAU,

Case No. 3:23-CV-355-wmc

Defendant and  
Counterclaimant,

and

GORDON ANDERSON et al.,

Intervenor Defendants  
and Intervenor  
Counterclaimants.

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**DECLARATION OF MATTHEW GAULKE**

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I, Matthew Gaulke, do hereby declare:

1. I am making this declaration based upon personal knowledge of the information contained herein.

2. I am the Town Chairman of the Town of Lac du Flambeau (the “Town”), which is located in Vilas County, Wisconsin. Before holding the position of the Town Chairman, I was a Town Supervisor. I have been an official for the Town since April 1987.

3. Around 7 a.m., Central time, on January 8, 2025 I received a phone call from a town resident notifying me that concrete blocks were placed at the entrance to East Ross Allen Lake Road.

4. In the afternoon of January 8, 2025 I personally drove to Elsie Lake Lane and found that concrete blocks were placed on the road. A photo of the concrete blocks on Elsie Lake Lane are attached as **Exhibit A**.

5. I then personally drove to East Ross Allen Lake Lane and found that concrete blocks were placed on the road. A photo of the concrete blocks on East Ross Allen Lake Lane are attached as **Exhibit B**.

6. I then personally drove to Center Sugarbush Lane and found that concrete blocks were placed on the road. A photo of the concrete blocks on Center Sugarbush Lane are attached as **Exhibit C**.

7. I then personally drove to Annie Sunn Lane and found that concrete blocks were placed on the road. A photo of the concrete blocks on Annie Sunn Lane are attached as **Exhibit D**.

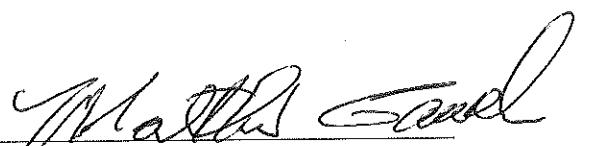
8. These concrete blocks are the exact type of those to which the cables were attached to create the complete barricades installed by the Band in March of 2023.

9. These concrete blocks were not placed on the roads by the Town of Lac du Flambeau.

10. Attached is **Exhibit E** is the letter I received from Tribal President Johnson on October 18<sup>th</sup>, 2024 indicating that if the Band did not receive all additional permit fees they are demanding, for the time period after September 12, 2024, by January 16<sup>th</sup>, 2025, that lack of payment “will result in restricted access over the Four Roads.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10<sup>th</sup> day of January, 2025



Matthew Gaulke  
Matthew Gaulke